

EXHIBIT H

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11193-NG

SHAWN DRUMGOLD,)
Plaintiff)
)
v.)
)
TIMOTHY CALLAHAN, et. al.,)
Defendants)
)

DEFENDANT, CITY OF BOSTON'S SUPPLEMENTAL RESPONSE TO
PLAINTIFF, SHAWN DRUMGOLD'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

NOW COMES THE DEFENDANT, City of Boston, and supplements its initial amended response to "Plaintiff, Shawn Drumgold's First Request for Production of Documents to the Defendant, The City of Boston" as follows:

REQUEST NO. 10

Any and all documents which are in your possession concerning training, rules, regulations, procedures, and policies of the Boston Police Department from January 1, 1989 to November 6, 2003. This includes, but is not limited to:

- A) any and all training procedures, manuals, videos or handbooks;
- B) any and all rules, regulations, policies or behavior codes; and
- C) names, addresses and incorporation information of any and all third party vendors contracted with for the purposes of offering training by the Boston Police Department.

SUPPLEMENTAL RESPONSE NO. 10

Objection. The defendant repeats its objection to this request on the grounds that it is vague, overly broad and unduly burdensome to which to respond.

Notwithstanding this objection, but subject to it, the defendant responds as follows:

The defendant produces a copy of a manual of the Boston Police Department entitled "Criminal Investigative Procedures", numbered COB2775-2870 and Special Orders of the Boston Police Department regarding procedures in the use of informants, Numbers 85-77, 89-21, 89-22, 89-45, 93-36, 95-4, and 96-31, numbered COB2871-2916. These documents are attached hereto as Exhibit A.

REQUEST NO. 11

For the period from January 1, 1989 to November 6, 2003 all police guidelines, directives, policy statements, procedures, and training materials, in any form and of any type, concerning policy policy, custom or practice regarding:

- A) training of officers generally.
- B) Specific discipline and/or training for the violation of constitutional rights.
- C) Any procedure, training or policy for Homicide investigators.

SUPPLEMENTAL RESPONSE NO. 11

Objection. The defendant repeats its objection to this request on the grounds that it is vague, overly broad and unduly burdensome to which to respond.

Notwithstanding this objection, but subject to it, the defendant responds as follows:

The defendant refers to the plaintiff to Supplemental Response No. 10.

Respectfully submitted,
By Defendant City of Boston
Through its attorneys,



John P. Roache (BBO# 421680)
Patrick J. Donnelly (BBO# 651113)
Roache & Associates, P.C.
66 Long Wharf
Boston, Massachusetts 02110
Tel.: (617) 367-0330

Date: August 30, 2007

CERTIFICATE OF SERVICE

I, Patrick J. Donnelly, hereby certify that on this 30th day of August 2007, I have served a copy of the foregoing DEFENDANT, CITY OF BOSTON'S SUPPLEMENTAL RESPONSE TO PLAINTIFF, SHAWN DRUMGOLD'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, to all counsel via first class mail, postage prepaid.



Patrick J. Donnelly (BBO# 651113)